

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Case No. 17-34283
Robert R. Fretz, Jr.,	§	
	§	Chapter 7
Debtor.	§	
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SKAI Foundation,	§	
Plaintiff,	§	
	§	
v.	§	Adv. No. 17-3414
	§	
Robert R. Fretz, Jr.,	§	
Defendant.	§	

MOTION TO DISMISS ADVERSARY PROCEEDING

Plaintiff SKAI Foundation, moves to dismiss all claims against Defendant Robert R. Fretz, Jr., and respectfully states:

1. Plaintiff desires to dismiss claims against Defendant Robert R. Fretz, Jr. asserted in this adversary proceeding.
2. As an answer has been filed in this proceeding, dismissal is not available by notice or stipulation, but must be requested by motion. See Fed.R.Civ.P. 41(a), incorporated for this proceeding by Fed.R.Bank.P. 7041.
3. Robert R. Fretz, Jr. has filed no counterclaims.
4. Plaintiff and Defendant Robert R. Fretz, Jr. have agreed to dismissal of claims against said Defendant, with each party to bear her or its own costs.

WHEREFORE, Plaintiff SKAI Foundation, prays that the Court dismiss claims against Defendant Robert R. Fretz, Jr. with prejudice.

Respectfully submitted,

By: /s/ Aaron J. Power
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Counsel for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Dismiss Robert R. Fretz, Jr. was served via this Court's e-filing system this 3rd day of July, 2018, to all counsel in this proceeding.

/s/ Aaron J. Power
Aaron J. Power